

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2012 NOV 28 P 3:51

CLERK'S OFFICE  
AT GREENBELT

BY *DR* DEPUTY

1 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,  
2 U.C.C.1-103.6, U.C.C.3-415, Natural Person IN FULL LIFE, SUI JURIS  
3 IN PROPRIA PERSONA  
4 4244 HILDRETH ST. SE.  
5 WASHINGTON, DC, [20019-9998]  
6 1-202-706-8063

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF COLUMBIA

9 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,  
10 U.C.C.1-103.6, Natural Person IN FULL LIFE, SUI JURIS, IN PROPRIA PERSONA

11 Plaintiff, Claimant

12 VS.

**CIVIL ACTION No.**

13 CEO - GINO ARCHER  
14 CAVALRY PORTFOLIO SERVICES,.LLC  
15 NEW YORK OPERATIONS  
16 500 SUMMIT LAKE DR.  
17 Valhalla, NY 10595  
18 1-914-347-3440 xt.13415

**DKC 12 CV 3506**

**COMPLAINT**

19 Defendant, Respondent

20 **PRELIMINARY STATEMENT**

21 1. This is an action for damages brought from violations of the Fair Credit Reporting Act  
22 (FCRA) Title15 U.S.C. §1681 *et seq.*

23 **JURISDICTION**

24 2. The jurisdiction of this Court is conferred by Title15 U.S.C. §1681p.

26 **FACTUAL ALLEGATION**

27 3. On MAY 2, 2010, Defendant initiated a credit inquiry of Plaintiff's credit report from  
28 TRANSUNION without permissible purpose.

## COUNT I

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title 15 U.S.C. §1681**

**WILLFUL NON-COMPLIANCE BY DEFENDANT CAVALRY PORTFOLIO  
SERVICES,LLC (DEBT COLLECTOR)**

3. Plaintiff is a consumer within the meaning of the FCRA, Title 15 U.S.C. § 1681a(c).

4. CAVALRY PORTFOLIO SERVICES,LLC (DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C. §1681s-2.

5. CAVALRY PORTFOLIO SERVICES,LLC (DEBT COLLECTOR), willfully violated the FCRA.

Defendant's Violations include, but are not limited to, the following:

(a) CAVALRY PORTFOLIO SERVICES,LLC (DEBT COLLECTOR), willfully violated Title15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title15 U.S.C. §1681b.

**WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$1,000 a Month from the date of credit pull against consumer credit report.

CAVALRY PORTFOLIO SERVICES,LLC (DEBT COLLECTOR), are liable for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title15 U.S.C. §1681n.

## COUNT II

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C. §1681**

**NEGLIGENT NON-COMPLIANCE BY DEFENDANT CAVALRY PORTFOLIO  
SERVICES,LLC (DEBT COLLECTOR),**

6. Plaintiff is a consumer within the meaning of the FCRA, Title 15 U.S.C. §1681a(c).

7. CAVALRY PORTFOLIO SERVICES,LLC (DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C.§1681s-2.

8. CAVALRY PORTFOLIO SERVICES, LLC (DEBT COLLECTOR), negligently violated the FCRA.

Defendant's violations include, but are not limited to, the following:

(a) CAVALRY PORTFOLIO SERVICES,LLC (DEBT COLLECTOR) negligently violated 15 U.S.C. §1681b (f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title 15 U.S.C. §1681b.

**WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$1,000 a Month from the date of credit pull against consumer credit report, CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR) are liable for actual damages, and attorney's fees and costs, pursuant to Title15 U.S.C. § 1681o.

## RELIEF

**WHEREFORE**, Plaintiff demands judgment for damages against, CAVALRY PORTFOLIO SERVICES,LLC (DEBT COLLECTOR) in the amount \$33,000 for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title 15 U.S.C. §1681n (a) (3) and Title15 U.S.C. §1681o (a)

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury of all issues as a matter of law.

Respectfully submitted this 28<sup>th</sup> day of November, 2012

NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,  
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